

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	
MMA LAW FIRM, PLLC,	§	Case No. 24-31596
	§	Chapter 11
Debtor.	§	

**LIMITED OBJECTION OF CRISTÓBAL M. GALINDO, P.C. D/B/A
GALINDO LAW FIRM TO THE DEBTOR’S MOTION TO COMPROMISE
CONTROVERSY WITH ALVENDIA, KELLY & DEMAREST, LLC**

(Refers to Docket No. 772)

TO THE HONORABLE EDUARDO V. RODRIGUEZ
CHIEF UNITED STATES BANKRUPTCY JUDGE:

COMES NOW Cristóbal M. Galindo, P.C. d/b/a Galindo Law Firm (“**GLF**” or “**Galindo**”), by and through its undersigned counsel, hereby submits this Limited Objection to the Debtor’s Motion to Compromise Controversy with Alvendia, Kelly, & Demarest, LLC (“**AKD**”) [Docket No. 772] (the “**Settlement Motion**”). In support thereof, GLF would respectfully show as follows:

I. Limited Objection

1. The dispute between GLF and MMA Law Firm, PLLC (“**GLF**”) has settled and GLD and MMA are actively drafting a settlement agreement to memorialize the terms of the agreement. Accordingly, GLF is filing the instant limited objection solely to preserve its rights pending approval of the forthcoming settlement agreement.

2. GLF does not oppose the Settlement Motion in general. However, GLF requests that any order approving the proposed settlement with AKD include language making it clear that neither approval by this Court of the settlement with AKD nor the settlement with AKD itself impair any rights that GLF may have or may assert with respect to the settlement funds

contemplated therein.

Dated: September 5, 2025

Respectfully submitted,

HAYWARD PLLC

By: /s/ Charlie Shelton

Charlie Shelton

State Bar No. 24079317

CShelton@HaywardFirm.com

7600 Burnet Road, Suite 530

Austin, Texas 78757

(737) 881-7100 (telephone/fax)

**COUNSEL FOR CRISTÓBAL M. GALINDO, P.C.
D/B/A GALINDO LAW FIRM**

CERTIFICATE OF CONFERENCE

GLF's counsel conferred with counsel for the Debtor on September 4, 2025 and anticipates that the parties will soon propose an agreed form of order resolving GLF's objection set forth above.

/s/ Charlie Shelton

Charlie Shelton

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on September 5, 2025, a true and correct copy of this Objection was filed with the Court and served via the Court's CM/ECF system upon all parties registered to receive such electronic service in this bankruptcy case, including the U.S. Trustee and Debtor's counsel.

/s/ Charlie Shelton

Charlie Shelton